

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

2020 APR 17 AM 10:05

MARGARET BOTKINS, CLERK  
CHEYENNE

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COREY MICHAEL COBB,**

Defendant.

**CRIMINAL COMPLAINT**

Case Number: 20-MJ-34-5

I, Kyle LaTulippe, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.


From on or about April 2, 2020, through and including April 9, 2020, in the District of Wyoming and elsewhere, the Defendant, **COREY MICHAEL COBB**, knowingly possessed a stolen firearm, namely, a Maverick shotgun, S/N MV66948J, which had been shipped or transported in interstate or foreign commerce, either before or after it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

In violation of 18 U.S.C. §§ 922(j), and 924(a)(2).

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

*(See attached Sworn Statement)*

Continued on the attached sheet and made a part hereof.

  
\_\_\_\_\_  
Signature of Complainant  
KYLE LATULIPPE

Sworn to before me and subscribed telephonically,

April 17, 2020

Date

at

Cheyenne, Wyoming

City and State

HON. KELLY H. RANKIN

United States District Court Judge

Name & Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

**SWORN STATEMENT OF ALCOHOL, TOBACCO, FIREARMS, AND EXPLOSIVES  
SPECIAL AGENT KYLE LATULIPPE IN SUPPORT OF CRIMINAL COMPLAINT**

1. I was a Federal Air Marshal (FAM) from March, 2009 to January, 2016. In that capacity I was a Visual Intermodal Prevention and Response (VIPR) team member, international team leader, and held other positions. I am a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. In 2016, I arrived at the Cheyenne, Wyoming ATF Field Office as an ATF Special Agent. Since starting as a special agent, I have participated in multiple investigations involving the illegal possession of firearms. I have been involved in multiple ATF investigations as the lead agent and as an agent assisting other lead agents.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. On April 10, 2020, I was contacted by Casper Police Department (CPD) Detective (Det.) Matt Bowman and I received a report from Det. Bowman regarding a burglary that occurred in Casper, Wyoming. This affidavit is based on this report, as well as conversations with investigators involved in this case (both in Wyoming and Colorado).

4. According to the CPD report, on April 4, 2020, CPD responded to the victim's (R.D.) residence located at 1625 South Maple, Casper, WY for a report of a burglary. R.D. informed the responded CPD officers that R.D. had been out of town for medical treatment since April 2, 2020, and when R.D. returned to R.D.'s residence on April 4, 2020, R.D. observed that approximately 18 firearms were missing from a building on R.D.'s property, including a Maverick shotgun, S/N MV66948J.

5. CPD advised ATF that on April 9, 2020, Corey Michael COBB was arrested at the Knights Inn Hotel located at 2409 East Pikes Peak Ave, Colorado Springs, CO. COBB was in possession of one of the firearms from the burglary described above, the Maverick shotgun, S/N MV66948J. That shotgun was also reported as being stolen in the National Crime Information Center (NCIC).

6. On April 10, 2020, ATF Task Force Officer (TFO) Adam Brewer interviewed COBB at the El Paso County Criminal Justice Center in Colorado Springs, CO. TFO Brewer read COBB his *Miranda* rights and COBB agreed to speak to TFO Brewer. COBB admitted to TFO Brewer that COBB committed the burglary in Casper stealing the aforementioned 18 firearms, including the Maverick shotgun, S/N MV66948J. COBB told ATF that he organized a group of unknown individuals, and COBB and those unknown individuals stole the firearms from R.D.'s residence in Casper, WY. COBB knew who his co-conspirators to the burglary were, but would not give their names to TFO Brewer. COBB told TFO Brewer that COBB sold the firearms to unknown individuals in Colorado Springs, CO, for approximately \$10,000 and an unspecified amount of methamphetamine. COBB told TFO Brewer that COBB knew the individuals that COBB sold the firearms to, but would not tell TFO Brewer their names either.

7. Based on my training and experience I know that the Maverick shotgun described in paragraph five above was not manufactured in Wyoming and therefore traveled in or affected interstate commerce. Furthermore, based upon the facts set forth herein, the Maverick shotgun (along with the other firearms) were stolen in Wyoming and Transported to Colorado.

**END OF SWORN STATEMENT**

---

**PENALTY SUMMARY**

---

**DEFENDANT NAME:** COREY MICHAEL COBB

**DATE:** April 17, 2020

**INTERPRETER NEEDED:** No

**VICTIM(S):** Yes

**OFFENSE/PENALTIES:** 18 U.S.C. §§ 922(j), and 924(a)(2)  
(Possession of Stolen Firearm)  
  
0-10 Years Imprisonment  
Up To \$250,000 Fine  
3 Years Supervised Release  
\$100 Special Assessment

**AGENT:** Kyle LaTullipe, ATF

**AUSA:** Stuart S. Healy III, Assistant United States Attorney

**ESTIMATED TIME OF TRIAL:** 1 to 5 days

**WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE:** Yes

**ARE THERE DETAINERS FROM OTHER JURISDICTIONS:** Yes